REMARKS

In the Office Action mailed December 31, 2007 (hereafter, "Office Action"), claims 1, 3-7, 9-13, 15-19, 21-37 and 39-48 stand rejected under 35 U.S.C. § 103. Claims 1, 7, 13, 19, 34 and 43 have been amended. Claim 49 has been added.

Applicants respectfully respond to the Office Action.

I. Clarification of Claim 38

Claim 38 was omitted from the Amendment filed June 6, 2007. In order to avoid confusion, claim 38 is hereby cancelled, and has been so indicated as set forth above.

II. Claims 1, 3-7, 9-13, 15-19, 21-24, 26, 29, 32, 34-37, 40, 43-45 and 47 Rejected Under 35 U.S.C. § 103

Claims 1, 3-7, 9-13, 15-19, 21-24, 26, 29, 32, 34-37, 40, 43-45 and 47 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over U.S. Patent No. 6,263,202 to Kato (hereinafter, "Kato") in view of U.S. Patent No. 6,972,082 to Levine (hereinafter, "Levine") in further view of U.S. Patent No. 6,687,673 to Mann (hereinafter, "Mann"). Claim 2 has been previously canceled. Applicants respectfully traverse the rejection of the remaining claims.

Applicants respectfully submit that the claims at issue are patentably distinct from the cited references. The cited references do not teach or suggest all of the subject matter in these claims.

Claim 1 has been amended to recite "the voice-recognition engine is further configured to interpret the audio-data as an alphanumeric character or a command using a sequencing scheme by matching the audio-data to a command and if there is no match, matching the audio-data to an alphanumeric character." Support for this amendment may be found in Applicants' specification, for example, page 8, paragraph [0026]. Kato, alone or in combination with Levine or Mann, does not teach or suggest this subject matter.

Instead Kato states:

> FIG. 2 is a functional block diagram of message reproduction by voice.
> In FIG. 2, a voice signal converted by a microphone 1201 is converted into a transmission character sequence (message information) by voice

recognition section 1202 and is then input to electronic mail transmission section 1203. Transmission information input indicating the transmission destination, such as telephone number, is also input. Selection information for selection of the output mode of the message information is also input to the transmission electronic mail sending section 1203.

Kato, col. 4, lines 55-64.

Converting a voice signal into a transmission character sequence does not teach or suggest "using a sequencing scheme by matching the audio-data to a command and if there is no match, matching the audio-data to an alphanumeric character." Kato does not teach or suggest that the voice recognition section first "match[es] the audio-data to a command and if there is no match . . . [then] match[es] the audio-data to an alphanumeric character." In fact, the Office Action admits that "Kato fails to teach interpreting the audio-data as matching a selected one of a set of commands." (Office Action, page 3.) The additions of Levine and Mann do not overcome the deficiencies of Kato.

Instead Levine states:

> The Personal Assistant provides a single voice controlled user interface for the subscriber, using an almost natural language interface. Using this interface, the subscriber can: place a call, transfer a message, forward a message to another subscriber, reply to a message, return a call, maintain an address book and distribution list, listen to e-mail through text-to-speech conversion, hear the name of a caller or person who left a message, schedule a meeting or appointment, cancel a scheduled meeting, hear or view the schedule, and maintain a to-do list.

Levine, col. 4, line 61 – col. 5, line 3.

It appears that the Office Action is asserting that "place a call, transfer a message, forward a message to another subscriber, reply to a message, return a call, [etc.]" teach or suggest "a set of commands." (See Office Action, page 3.) However, simply listing possible functions the "Personal Assistant provides [through] a single voice controlled user interface" does not teach or suggest "using a sequencing scheme by matching the audio-data to a command and if there is no match, matching the audio-data to an alphanumeric character."

In addition, Levine states:

> Placing calls is the most usable service of a Personal Assistant system. The system uses near natural language recognition techniques, so the subscriber may say `call John Dow at Home` and let the system determine

the command (call), the name (John Dow) and the location (home). The system combines the ease of use of voice recognition and near natural language user interface, supported by a large and multiple entry address book.

Levine, col. 5, lines 60-67.

Determining "the command (call), the name (John Dow) and the location (home)" from the phrase "call John Dow at Home" does not teach or suggest "using a sequencing scheme by matching the audio-data to a command and if there is no match, matching the audio-data to an alphanumeric character." Levine provides no teaching in the above-cited passage on how the system determines that word "call" is the command. Instead, Levine simply states that the system "combines the ease of use of voice recognition and near natural language user interface, supported by a large and multiple entry address book." (Id.)

Further, Levine states:

> In addition the Personal Assistant provides sequential searching capabilities based on the subscriber defaults or search order for a contact. When placing a call, the subscriber might say `call John Dow at the office` or `Call John Dow`. If the latter is used, the system will analyze the search order for John Dow at the Address Book, and will assume what location to search first. Alternatively if there is no search order set for John Dow, the system will ask the subscriber `Home? Or Office?` according to the actual information in the Address Book, so if there is only one number in the Address Book, the system will not ask for location and establish the call immediately. The dialogue with the subscriber in this case is shorter, not only because the user interface design guides the caller via very short prompts of what input is expected, but mainly because the system uses all `known` information like number of phone numbers exist for the contact, the search order (e.g. home first, office second and mobile third, if the search order indicates that for a particular contact the home phone should be tried first followed by the office phone and last the mobile phone). The system will not even ask for location (although it could be specified and override the search order).

Levine, col. 4, line 61 to col. 6, line 22.

The "sequential searching" mentioned above by Levine does not teach or suggest "a sequencing scheme" as claimed by Applicants. Rather, the "sequential searching" taught by Levine provides "search order for a contact". (Id.) For example, "the subscriber might say . . . `Call John Dow`". (Id.) "[T]he system will analyze the search order for John Dow at the

Address Book, and will assume what location to search first." (Id.) In other words, the "sequential searching" taught by Levine provides "the search order (e.g. home first, office second and mobile third, if the search order indicates that for a particular contact the home phone should be tried first followed by the office phone and last the mobile phone)." (Id.) The "sequential searching" does not teach or suggest "a sequencing scheme by matching the audio-data to a command and if there is no match, matching the audio-data to an alphanumeric character."

The addition of Mann does not overcome the deficiencies of Kato and Levine. In fact, the Office Action merely points to Mann to support the assertion that "Mann teaches Method of performing speech recognition by comparison of single spoken character." (Office Action, page 4.) The Office Action does not point to, and Applicants cannot find, any teaching or suggestion by Mann of "using a sequencing scheme by matching the audio-data to a command and if there is no match, matching the audio-data to an alphanumeric character."

In view of the foregoing, Applicants respectfully submit that claim 1 is patentably distinct from the cited references. Accordingly, Applicants respectfully request that the rejection of claim 1 be withdrawn.

Claims 3-6 depend either directly or indirectly from claim 1. Accordingly, Applicants respectfully request that the rejection of claims 3-6 be withdrawn.

Claims 7, 13, 19, 34 and 43 include subject matter similar to the subject matter of claim 1 addressed above. As such, Applicants submit that claims 7, 13, 19, 34 and 43 are patentably distinct from the cited references for at least the same reasons as those presented above in connection with claim 1.

Claims 9-12 depend directly from claim 7. Claims 15-18 depend either directly or indirectly from claim 13. Claims 21-24 depend directly from claim 19. Claims 35-37 depend either directly or indirectly from claim 34. Claims 44-45 depend either directly or indirectly from claim 43. Accordingly, Applicants respectfully request that the rejection of claims 9-12, 15-18, 21-24, 35-37 and 44-45 be withdrawn.

Claims 26, 29, 32, 40 and 47 recite "wherein the multiple word audio-data is in the form of 'Capital X,' wherein 'X' represents one of the group of alphabetical letters from A to Z." Kato, alone or in combination with Levine and Mann, does not teach or suggest this subject matter. The Office Action mailed August 27, 2007 specifically states "the combination of Kato,

Levine . . . fails to disclose the multiple word audio-data is in the form of 'Capital X,' wherein 'X' represents one of the group of alphabetical letters from A to Z as specified in the claim." (Office Action of August 27, 2007, page 9.) In fact, the Office Action of August 27, 2007 specifically stated that claims 26, 29, 32, 40 and 47 "would be allowable if rewritten in independent form." (Id.)

Claims 26, 29, 32, 40 and 47 were rewritten in independent form in Applicants' response to the Office Action mailed August 27, 2007. Such response was submitted on October 31, 2007. In any event, the addition of Mann does not overcome the deficiencies of Kato and Levine in teaching or suggesting "wherein the multiple word audio-data is in the form of 'Capital X,' wherein 'X' represents one of the group of alphabetical letters from A to Z."

Instead Mann states:

> [R]eceiving acoustic spoken input including a single alphabetic character and a word association with the single character such that the first character of the word is intended to be the same as the single alphabetic character.

Mann, abstract.

A single character and a word associated with that single character does not teach or suggest the "multiple audio-data is in the form of 'Capital X,'". The form "Capital X" implies that the character "X" is in uppercase form. Mann does not teach or suggest that the word associated with the single character is intended to indicate whether or not the character is in uppercase form. Instead, "the first character of the word is intended to be the same as the single alphabetic character." (Id.) To further illustrate, Mann states:

> [A]lphabetic characters are associated with certain words: A for Alpha, C for Charlie, T for Tango, etc . . . each letter can be recognized simply by listening to its corresponding word.

Mann, col. 2, lines 53-56.

The first character of the word associated with the single character in Mann is thus intended to "be the same as the single alphabetic character." (Mann, abstract.) Words such as "Alpha . . . Charlie . . . Tango, etc." do not teach or suggest "multiple word audio-data is in the form of 'Capital X,' wherein 'X' represents one of the group of alphabetical letters from A to Z." Instead, as previously illustrated, the words (specifically the first character of the word) used in

Mann merely serve to indicate the value of the single alphabetic character. The words in Mann do not teach or suggest whether or not the alphabetic character is in uppercase form.

In view of the foregoing, Applicants respectfully submit that claim 26, 29, 32, 40 and 47 is patentably distinct from the cited references. Accordingly, Applicants respectfully request that the rejection of claim 26, 29, 32, 40 and 47 be withdrawn.

III.   Claims 25, 27, 28, 30, 31, 33, 39, 41, 42, 46 and 48 Rejected Under 35 U.S.C. § 103

Claims 25, 27, 28, 30, 31, 33, 39, 41, 42, 46 and 48 stand rejected under 35 U.S.C. § 103(a) as being unpatentable over Kato in view of Levine in further view of Mann in further view of U.S. Patent No. 5,838,458 to Tsai (hereinafter, "Tsai"). Applicants respectfully traverse. The standard to establish a *prima facie* case of obviousness is provided above. (See M.P.E.P. § 2142.)

Claims 25 and 27 depend directly from claim 1. Claims 28 and 30 depend directly from claim 13. Claims 31 and 33 depend directly from claim 19. Claims 39, 41 and 42 depend directly from claim 34. Claims 46 and 48 depend directly from claim 43. Accordingly, Applicants respectfully request that the rejection of claims 25, 27, 28, 30, 31, 33, 39, 41, 42, 46 and 48 be withdrawn.

IV.   New Claim 49

Claim 49 has been added. Applicants submit that claim 49 is fully supported by Applicants' specification. Claim 49 includes subject matter similar to the subject matter described hereinabove in relation to claims 1 and 13. As such, Applicants submit that claim 49 is patentable for at least the same reasons as those previously described.
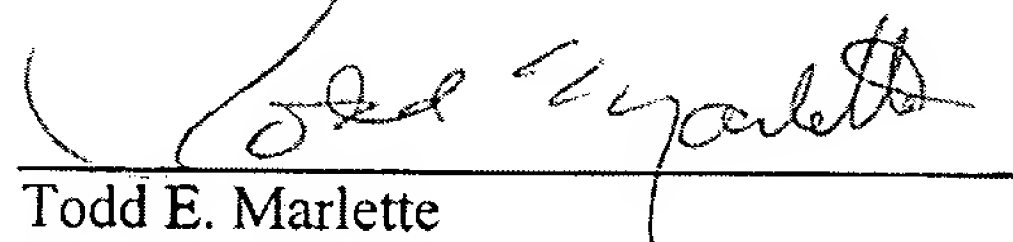
REQUEST FOR ALLOWANCE

In view of the foregoing, Applicants submit that all pending claims in the application are patentable. Accordingly, reconsideration and allowance of this application are earnestly solicited. Should any issues remain unresolved, the Examiner is encouraged to telephone the undersigned at the number provided below.

Respectfully submitted,

Dated: 4/18/2008

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